

REMARKS

I. Objection to Claim 66

Claim 66 was objected to under 37 CFR 1.75(c). In response to this objection, Applicants have cancelled Claim 66.

II. 35 U.S.C. § 103(a) Rejections

Independent Claims 3 and 15 were rejected under 35 U.S.C. 103(a) as being unpatentable over a combination of six references: European Patent Application No. 0 292 248 to Steiner et al., U.S. Patent No. 5,544,356 to Robinson et al., knowledge commonly known in the art, as evidenced by U.S. Patent No. 6,088,761 to Aybay, U.S. Patent No. 6,191,663 to Hannah, and U.S. Patent No. 4,882,554 to Akaba et al., and “MULTOS – a definition from Whatis.com.” Independent Claims 3 and 15 were also rejected under 35 U.S.C. 103(a) as being unpatentable over the proposed combination of U.S. Patent Application No. US 2002/0195493 to Dell and Robinson et al. Applicants respectfully traverse these rejections for the reasons set forth below.

Independent Claims 3 and 15 both recite a mass storage interface that is a non-linear interface. In both grounds of rejections of these claims, it was asserted that Robinson et al. teaches this element through its use of a flash memory, which was asserted to be a non-linearly accessed memory. To clarify the claims, Applicants have amended independent Claims 3 and 15 to now recite that the mass storage memory stores data in a non-linear structure, that the data is only accessible in a block that is too large for the processing unit to utilize without first reading out and caching the block, and that the mass storage interface is operative to retrieve the data from the mass storage memory and store the data in a linear form usable by the processing unit. Support for this amendment can be found, for example, at paragraphs 15 and 32 of Applicants’

specification.

Robinson et al., the reference relied upon for teaching the “non-linear” element, does not disclose these added elements. Robinson et al. merely discloses the use of flash memory, which was asserted to be a non-linearly accessed non-volatile memory. However, even assuming that the flash memory in Robinson et al. is accessed non-linearly, there is no teaching in Robinson et al. that the data stored in that flash memory is only accessible in a block that is too large for the purported processing unit in the proposed combination to utilize without first reading out and caching the block. Further, even assuming that the interface in the proposed combination is able to non-linearly access the flash memory, there is no teaching in Robinson et al. of an interface retrieving data from the flash memory and storing the data in a linear form usable by the processing unit. Because Robinson et al. is missing the elements added to clarify the claims, Applicants respectfully submit that the rejections of independent Claims 3 and 15 and their dependent claims should be withdrawn.

Further, Applicants wish to note an additional ground of patentability with respect to the rejections based on the proposed combination including Steiner et al. In that rejection, the MULTOS document was relied upon in an attempt to cure the admitted deficiency in the proposed combination — that a program memory portion stores at least two operating sequences and a processing unit operates on user data according to an operating sequence selected by the processing system from said at least two additional operating sequences. While the MULTOS document generally discusses the installation of multiple application programs on a memory card, the MULTOS document does not teach that a processing unit in the card operates on user data according to an operating sequence selected by a processing system coupled to the card, as recited in independent Claims 3 and 15. The Office Action appears to be asserting that the

selection occurs in the proposed combination when a current application is erased in favor of a new application being loaded onto the card. However, independent Claims 3 and 15 recite the storage of at least two additional operating sequences and a selection of one of those operating sequences by the processing system coupled to the card. The recitation of storage and selection is clearly different from swapping out one application program for another, as in the proposed combination. Accordingly, Applicants respectfully request that the rejections based on the proposed combination including Steiner et al. be withdrawn.

III. Conclusion

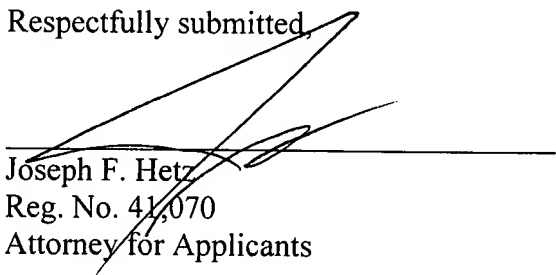
In view of the foregoing amendments and remarks, Applicants respectfully submit that the present application is in condition for allowance. Reconsideration is respectfully requested. Applicants note that while they presented arguments directed to only some elements in the independent claims, Applicants reserve the right to argue additional grounds of patentability provided by other elements in the independent claims and by elements in the dependent claims.

If the Examiner has any questions, the Examiner is invited to contact the undersigned attorney at (312) 321-4719.

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Respectfully submitted,



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